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Attorney for the Defendant Phillip Dobbins

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	Criminal No. 21-CR-00084-NDF-1
)	
v.)	
)	
Phillip Dobbins)	
)	
Defendant.)	

DEFENDANT'S MOTION TO VACATE REVOCATION OF BOND HEARING

COMES NOW, the Defendant, Phillip Dobbins, by and through Counsel, Christopher Humphrey of Humphrey & Associates, P.C., hereby moves the court for an order vacating the revocation of bond hearing set for January 24, 2022 at 11 am or continuing the hearing until the trial date in 21-CR-128-NDF for the following reasons:

1. Mr. Dobbins does not wish to advocate for release.
2. Mr. Dobbins cannot make any admissions in this revocation, as any admission would be used against him in 21-CR-128..
3. Trial on the escape charge and this pending matter is to occur on March 14, 2022.
4. Depending on the resolution of this matter, the revocation of bond will be moot.
5. Counsel does not know of any speedy revocation right.
6. It would serve judicial economy to vacate the hearing on January 24, 2022 at 4pm.

7. Counsel for the US Attorney, Timothy J. Forwood does not object.
8. The ends of justice are served by a continuance in this matter.

WHEREFORE the Defendant respectfully asks the court to consider vacating the revocation of bond hearing or moving the hearing until March 14, 2022 .

Respectfully submitted this 21 day of January 21, 2022.

Christopher Humphrey
Counsel for Phillip Dobbins

By:

/s/ Christopher Humphrey
Christopher Humphrey
Humphrey & Associates, P.C.

CERTIFICATE OF SERVICE

I, hereby certify that on January 21, 2022, I electronically served *Defendant's Motion to Vacate Bond Revocation Hearing* on the CM/ECF System and have served upon all counsel of record a copy of the foregoing document by uploading the document into the electronically filing system, which automatically causes an email notification to be sent to all counsel of record in the case.

Timothy J. Forwood
timothy.forwood@usdoj.gov

/s/ Christopher Humphrey
Christopher Humphrey
Humphrey & Associates, P.C.